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June 26, 2018

VIA ECF

Hon. Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Ravina v. Columbia University a/k/a the Trustees of Columbia University in the City of New York and Geert Bekaert*
No. 1:16-cv-02137-RA

Dear Judge Abrams:

We represent Defendant Columbia University ("Columbia") in the above-referenced matter. On behalf of all parties, we write to request permission (1) to file separate proposed jury instructions; and (2) an extension of time to submit the jury instructions, a joint verdict form and deposition designations, objections and counter-designations to Monday, July 2, 2018 by 11 a.m. While the parties have been largely able to agree on the other pre-trial submissions, the fundamental differences between Defendants and Plaintiff on the jury instructions render a joint submission unwieldy, and would amount to essentially separate submissions. Additionally, the parties are working on the designations and on agreeing to the extent possible on the verdict form, but need more time on those. We have conferred with Plaintiff's counsel and counsel for Defendant Bekaert and they join this request.

Respectfully submitted,

/s/ Steven D. Hurd

Steven D. Hurd

cc: All Counsel of Record

SDH:dm